

## **LUCAS COUNTY WORKFORCE DEVELOPMENT AGENCY (LCWDA) CUSTOMIZED TRAINING INTERIM POLICY**

The Workforce Investment Act Customized Training (CT ) Program is administered in Lucas County under the authorizations of the Workforce Investment Act of 1998 and the Rules and Regulations governing Customized Training that are defined in Sections 663.705 through 663.720 of CFR Part 652.

The Lucas County Workforce Investment Board (WIB), by approving this CT policy, confirms that employers who meet the policy requirements may be approved for CT contracts, upon the recommendation of the Workforce Development Director or his/her Designee (WDD/D).

### **Definitions of Customized Training**

**Customized Training (CT)** is defined as training that meets the following conditions:

1. The training is designed to meet the special requirements of an employer (or group of employers)
2. The training is conducted with a commitment by the employer to employ, or in the case of incumbent workers, continue to employ trainees upon successful completion of the training
3. The employer pays for no less than 50 percent of the cost of training
4. The training takes place at the job site or off site; is conducted by either the employer, or by trainers that have been retained by the employer

### **CT Contract Requirements**

1. All CT must be sponsored by an employer, or group of employers. Training providers may apply for CT grants on behalf of an employer with verification from the employer and when the contract is performance-based.
2. CT grants will be awarded for the following purposes:
  - a. The introduction of new technologies
  - b. Introduction to new production or service procedures
  - c. Promoting incumbent workers to new jobs that require additional skills that, in turn, result in the creation of additional entry-level positions within the company
  - d. Other appropriate purposes, as identified by the WIB.
3. Upon completion of CT, trainees must:
  - a. Be employed at least 32 hours per week in the training position
  - b. Receive a pay increase of at least 3% for successfully completing the training, and be within the prevailing wage for the training position, as identified by the Labor Market Index (LMI).
  - c. Obtain a credential. (See Credential Policy)

4. Conflict of Interest

- A. A member of the Board may not vote on a matter under consideration by the Board regarding the provision of services by such member, an entity that such member represents; or that would provide direct financial benefit to such member or the immediate family of such member.
- B. A member of the Board may not engage in any other conduct determined by the Governor to constitute a conflict as specified in the State plan.
- C. A Board member may not use or authorize the use of authority or influence of the office to secure anything of value or the promise or offer of anything of value that is of such a character as to manifest a substantial and improper influence upon the Board member with respect to that person's duties.
- D. No Board member shall solicit or accept anything of value that is of such a character as to manifest a substantial and improper influence upon the Board member with respect to that person's duties.
- E. All Board members must comply with the provisions and requirements of *R.C. Chapter 102* and the conflict of interest provisions of the Bylaws of the Governor's Workforce Policy Board and the Lucas County Workforce Investment Board.

5. The training occupation should have career advancement potential and must be in accordance with the trainees' Individual Employment Plan (IEP).

**Requirements for Businesses Applying for CT Funding**

- 1. CT contracts can be written with employers from the public, private non-profit, or the private for-profit business sectors.
- 2. Businesses must be in operation, or have planned a new or expanded operation in Lucas County through the LCWDA in order to be eligible for funding.
- 3. Businesses must furnish information, including the company's IRS identification Number, State Unemployment Insurance Account Number, and proof that all trainees will be covered under Workers' Compensation.
- 4. Union concurrence is required in order for some employers to enter CT contracts. In these cases, the employer must provide the LCWDA with written concurrence from the Union for the CT. CT shall not impair on any existing contract for services or collective bargaining agreements. Contracts cannot be written for employers who are currently involved in labor disputes.
- 5. Businesses applying for CT may not involve religious or political activity.
- 6. Businesses must certify that neither the employing company nor its Principals are presently debarred, suspended, proposed for debarment, declared ineligible, or excluded from participation by and Federal Department or Agency.

7. CT trainees shall not displace (including a partial displacement, such as a reduction of hours of non-overtime work, wages, or employment benefits) any current employee, as of the date of the training contract.
8. CT funding will **not** be approved for any business that has relocated until 120 days after the relocation, if that relocation resulted in the loss of employment for any employee at the previous location, and the previous location was within the United States.

### **Customized Training Services Requirements**

1. Training services may be provided through community colleges, school districts, area vocational/technical centers, state universities, or licensed and certified private institutions.
2. CT training may be conducted at the business facility, the training provider's facility, or at a combination of sites.
2. Instructors can be either full or part-time educators, or professionals from the business community.
3. Reimbursable training expenses include:
  - a. Instructors'/Trainers' salaries for the actual time of instruction/training
  - b. Curriculum development costs
  - c. Delivery of training by an eligible provider
  - d. Textbooks and manuals
  - e. Materials, supplies, and training equipment
  - f. Trainee wages
  - g. Travel expenses necessary for training
4. Non-reimbursable training expenses include:
  - a. Purchases of capital equipment (production equipment)

### **Training Budget Requirements**

1. All training budgets, including reimbursements, must be pre-approved by the Workforce Development Director or his/her Designee (WDD/D).
2. Businesses must, at a minimum, provide a fifty percent (50%) match for the expenses of the training project.
3. Business must keep accurate records of the project's implementation process, trainees' attendance, and trainees' performance in the training program.
4. Billing for business reimbursements will be handled by the Lucas County Office of Management and Budget (LCOMB). Businesses must submit reimbursement requests on a monthly basis, in accordance with LCOMB policy.

5. Any discovery of inconsistencies in attendance, pay, or training costs shall be handled immediately by the Job Development staff member assigned to the business, and reported to the WDD/D.
6. The LCWDA reserves the right to terminate or reduce funding, in whole or in part, if sufficient State or Federal funds are not available, with a thirty (30) day notice.